

**IN THE UNITED STATES DISTRICT
COURT FOR THE SOUTHERN DISTRICT
OF TEXAS CORPUS CHRISTI DIVISION**

MARC VEASEY, <i>et al.</i> ,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	Civil Action No. 2:13-cv-193 (NGR)
	§	
GREG ABBOTT, <i>et al.</i> ,	§	
	§	
Defendants.	§	

UNOPPOSED MOTION FOR PLAINTIFFS' COUNSEL TO APPEAR

Plaintiffs Estela Garcia Espinoza, La Union del Pueblo Entero (LUPE) Maximina Lara and Eulalio Mendez respectfully ask this Court to allow a substitution of their counsel. Their previous counsel José Garza, Malinda Van Dalen and Peter McGraw are no longer available to represent them in this case:

Mr. Garza has retired from Texas Rio Grande Legal Aid. He continues to represent the Mexican-American Legislative Caucus in this case.

Ms. Van Dalen resigned from Texas Rio Grande Legal Aid and moved to New York.

Mr. McGraw continues to work for Texas Rio Grande Legal Aid but his time is devoted to other clients' needs.

Further, Robert Doggett continues as counsel in this case but he is now Texas Rio Grande Legal Aid's Executive Director. He cannot devote time to the work that this case requires.

Plaintiffs seek permission for Susan Zinn and Alexander Stamm to appear as their new counsel.

Ms. Zinn graduated with honors from the University of Texas School of Law in 1983. In 1984 and 1985, Ms. Zinn clerked for The Honorable George P. Kazen in the United States District Court for the Southern District of Texas in Laredo. She joined Texas Rio Grande Legal Aid's staff (then Texas Rural Legal Aid) in 1985. She has devoted her legal career to serving the poor and has worked full time or part time for TRLA since 1985. Her primary focus has been on health care law for the poor but her work includes other issues of importance to the client population, including several voting rights cases. In 1995, Ms. Zinn started to work part time for TRLA and part time in her own office, where she continued as lead counsel in the *Frew* class action litigation to challenge Texas' failure to provide Medicaid health care services to children. *See Frew v Hawkins*, 540 U.S. 431 (2014), *subsequent history omitted*. She wound down her private practice in the mid-2010s because her husband was diagnosed with cancer. Ms. Zinn continues to work part time for TRLA.

Alexander Stamm graduated with honors from the University of Texas School of Law in 2017. From 2017–19, he worked as a law clerk for the Honorable Robert L. Pitman, United States District Judge for the Western District of Texas, in Austin, Texas. He has practiced law with Texas RioGrande Legal Aid since September 2019. Mr. Stamm litigates on behalf of clients throughout TRLA's service area in both state and federal court, with a focus on civil rights and housing cases in central Texas.

The Fifth Circuit Court of Appeals permitted Ms. Zinn and Mr. Stamm to represent these same Plaintiffs in the recently remanded appeal that affirmed this Court's grant of attorneys' fees and costs to the Plaintiffs in this case.

Accordingly, Plaintiffs respectfully ask the Court to allow Ms. Zinn and Mr. Stamm to represent them before this Court.

October 18, 2021

Respectfully submitted,

By: /s/ Robert W. Doggett
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Counsel for Plaintiffs Estela Garcia Espinoza, La
Union del Pueblo Entero (LUPE) Maximina Lara
and Eulalio Mendez

CERTIFICATE OF CONFERENCE

I hereby certify that I have conferred with all of Plaintiffs' counsel by email during the week of October 11, 2021. They did not object to this motion. I also conferred with Defendants' counsel, Christopher Hilton, Deputy Chief, General Litigation Division, Office of the Attorney General of Texas by telephone on October 14, 2021. He said that Defendants also do not object to this motion.

/s/ Susan Zinn
Counsel for Plaintiffs Estela Garcia Espinoza, La
Union del Pueblo Entero (LUPE) Maximina Lara
and Eulalio Mendez

CERTIFICATE OF SERVICE

I hereby certify that on October 18, 2021, a true and correct copy of the foregoing

document and attachment was served via the Court's ECF system to all counsel of record.

s/ Susan Zinn

Counsel for Plaintiffs Estela Garcia Espinoza, La
Union del Pueblo Entero (LUPE) Maximina Lara
and Eulalio Mendez
and Eulalio Mendez